FOR THE DISTRICT OF M	ARYLAND
(Northern Division	n)
MAYOR AND CITY COUNCIL OF	
BALTIMORE CITY, A MUNICIPAL )	
CORPORATION, et al.,	
)	
Plaintiffs, Counter-	
Claim Defendants,	
v. )	
)	
BROOKE ALLEN, et al.,	Civil Action No. 16-03486 -ELH
)	
Defendants, Counter- )	
Claim Plaintiffs.	

## **JOINT INITIAL REPORT**

Plaintiffs, counterclaim defendants, Mayor And City Council Of Baltimore City, Baltimore Festival Of The Arts, Inc., and Baltimore Office Of Promotion & The Arts, Inc. and Defendants, counterclaim plaintiffs, Brooke Allen, Justin Allen and What Works Studio, LLC, by their undersigned counsel, and pursuant to the scheduling order issued by this Court, report the following:

### 1. ADR Conference

The parties do not request an early settlement/ADR conference at this time. The parties are interested in participating in a settlement conference after the completion of discovery.

## 2. Electronic Discovery

The parties have conferred regarding the discovery of electronically stored information and have agreed on the format for the production of electronically stored information.

## 3. <u>Modifications to Scheduling Order and Expert Discovery</u>

The parties request that the Scheduling Order be modified to defer expert discovery until after dispositive motions are decided. The parties request that April 5, 2017 remain as the deadline for fact discovery, as the proposed order currently provides and are not seeking any other modifications to the scheduling order.

### 4. <u>Deposition Hours</u>

At this time, the parties agree that each side will require fifty (50) hours of deposition time.

# 5. <u>Consent to Proceed Before United States Magistrate Judge</u>

The parties do not consent to proceed before a United States Magistrate Judge at this time.

Date: December 2, 2016

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2nd day of December, 2016, a copy of foregoing was served by the Court's ECF filing system on:

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